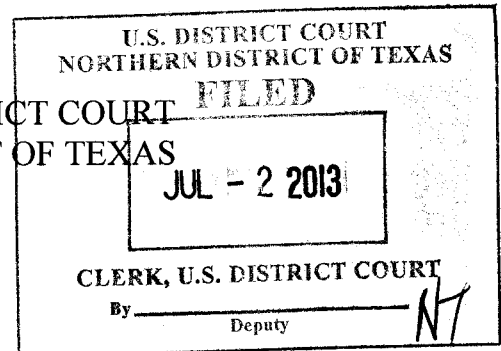


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

§

VS.

§

§

§

BARRETT LANCASTER BROWN (1)

§

NO. 3:12-CR-413-L

[Supersedes Indictment returned
on December 4, 2012]

The Grand Jury charges:

FIRST SUPERSEDING INDICTMENT

Count One

Traffic in Stolen Authentication Features
(18 U.S.C. §§ 1028(a)(2), (b)(1)(B), and (c)(3)(A))
Aid and Abet
(18 U.S.C. § 2)

On or about December 25, 2011, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Barrett Lancaster Brown**, aided and abetted by persons known and unknown to the Grand Jury, in and affecting interstate and foreign commerce, did knowingly traffic in more than five authentication features knowing that such features were stolen, in that **Brown** transferred the hyperlink "http://wikisend.com/download/597646/stratfor_full_b.txt.gz" from the Internet Relay Chat (IRC) channel called "#Anonops" to an IRC channel under **Brown's** control called "#ProjectPM," which hyperlink provided access to data stolen from the company Stratfor Forecasting Inc., to include in excess of 5,000 credit card account numbers, the card holders' identification information, and the authentication features for the credit cards

known as the Card Verification Values (CVV); and by transferring and posting the hyperlink, **Brown** caused the data to be made available to other persons online without the knowledge and authorization of Stratfor Forecasting Inc. and the card holders.

In violation of 18 U.S.C. §§ 2 and 1028(a)(2), (b)(1)(B), and (c)(3)(A).

Count Two
Access Device Fraud
(18 U.S.C. §§ 1029(a)(3) and (c)(1)(A)(i))
Aid and Abet
(18 U.S.C. § 2)

From on or about December 25, 2011, through at least on or about March 6, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Barrett Lancaster Brown**, aided and abetted by persons known and unknown to the Grand Jury, in and affecting interstate and foreign commerce and with intent to defraud, did possess at least fifteen unauthorized access devices, in that **Brown** possessed stolen credit card account numbers and the authentication features for the credit cards known as the Card Verification Values (CVV) without the knowledge and authorization of the card holders.

In violation of 18 U.S.C. §§ 2 and 1029(a)(3), and (c)(1)(A)(i).

Counts Three Through Twelve
 Aggravated Identity Theft
 (18 U.S.C. § 1028A(a)(1))
 Aid and Abet
 (18 U.S.C. § 2)

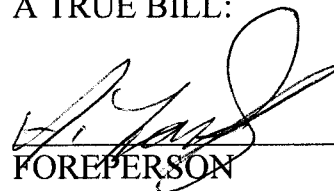
From on or about December 25, 2011, through at least on or about March 6, 2012, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Barrett Lancaster Brown**, aided and abetted by persons known and unknown to the Grand Jury, during and in relation to a felony violation of 18 U.S.C. § 1028(a)(2), knowingly transferred and possessed without lawful authority the means of identification of the persons below referenced, said means of identification consisting of the credit card account numbers; the corresponding authentication features for the credit cards known as the Card Verification Values (CVV); the card holders' names and usernames for online account access; and the card holders' physical addresses, phone numbers, and email addresses.

COUNT	CARD HOLDER	CITY, STATE	AMERICAN EXPRESS CC # (last four digits)	CC CVV (redacted)
3	BM	Houston, TX	5003	4*87
4	CD	Dallas, TX	4011	9*71
5	BH	Spicewood, TX	1007	4*28
6	BL	Galveston, TX	2004	4*20
7	BS	Dallas, TX	1009	8*55
8	BC	Dallas, TX	3009	4*10
9	BW	Dallas, TX	2732	7*16
10	MT	Coco Beach, FL	4007	9*98

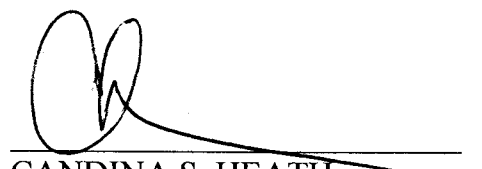
COUNT	CARD HOLDER	CITY, STATE	MASTER CARD CC # (last four digits)	CC CVV (redacted)
11	KR	Tucson, AZ	6394	4*8
12	BJ	Richardson, TX	6444	4*3

In violation of 18 U.S.C. §§ 2 and 1028A(a)(1).

A TRUE BILL:


FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY


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Northern District of Texas
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

BARRETT LANCASTER BROWN

FIRST SUPERSEDING INDICTMENT

18 U.S.C. §§ 1028 (a)(2), b(1)(B), and (c)(3)(A)
Traffic in Stolen Authentication Features

18 U.S.C. § 2
Aid and Abet

18 U.S.C. §§ 1029(a)(3) and (c)(1)(A)(i)
Access Device Fraud

18 U.S.C. § 2
Aid and Abet

18 U.S.C. § 1028A(a)(1)
Aggravated Identity Theft
18 U.S.C. § 2
Aid and Abet

12 Counts

A true bill rendered

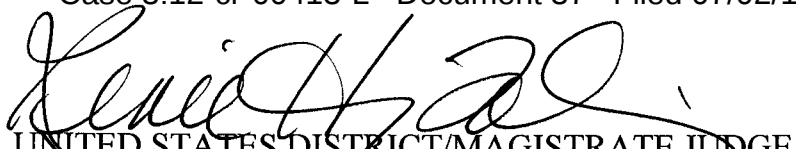
DALLAS

 FOREPERSON

Filed in open court this 2 day of July 2013

Clerk

Defendant already in Federal custody at Mansfield since 9/13/2012


UNITED STATES DISTRICT/MAGISTRATE JUDGE
Criminal Case pending 3:12-CR-413-L

Defendant also indicted in two other cases (3:12-CR-317-L and 3:13-CR-030-L)